

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

----- X  
In re: :  
:   
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:   
as representative of : Case No. 17-BK-3283 (LTS)  
:   
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)  
:   
Debtors.<sup>1</sup> :  
----- X

----- X  
In re: :  
:   
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:   
as representative of : Case No. 17-BK-3567 (LTS)  
:   
THE PUERTO RICO HIGHWAYS AND :   
TRANSPORTATION AUTHORITY, :   
:   
Debtor. :  
----- X

**JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN SUPPORT  
OF GOVERNMENT PARTIES' OBJECTION TO DRA PARTIES' STANDING TO  
SEEK RELIEF FROM AUTOMATIC STAY OR IN ALTERNATIVE, ORDERING  
PAYMENT OF ADEQUATE PROTECTION**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Committee”)<sup>2</sup> hereby files this joinder (the “Joinder”) in support of the Financial Oversight and Management Board for Puerto Rico’s and the Puerto Rico Fiscal Agency and Financial Advisory Authority’s (collectively, the “Government Parties”) *Objection to the DRA Parties’ Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection* (the “Objection”) [Docket. No. 16518 in Case No. 17-3283]. In connection with the Objection, the Committee respectfully states as follows:

1. The Committee hereby joins the Objection.
2. The Committee reserves its rights to adopt any arguments that it has not expressly joined in the future in this or other proceedings, as well as to raise additional arguments beyond the issues to be addressed at any hearing on the motion to lift the automatic stay.

### **CERTIFICATION**

3. Pursuant to Section 9 of the *Final Case Management Order for Revenue Bonds* [Docket No. 12186 in Case No. 17-3283], the Committee certifies that it has taken reasonable efforts by coordinating with the Government Parties to avoid duplicative briefing or to avoid submitting a brief that is not longer than necessary.

*[Remainder of page intentionally left blank.]*

---

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

WHEREFORE, the Committee respectfully requests that this Court deny the lift stay motion.

Dated: April 21, 2021

By: /s/ Luc A. Despins

PAUL HASTINGS LLP  
Luc A. Despins, Esq. (*Pro Hac Vice*)  
Nicholas A. Bassett, Esq. (*Pro Hac Vice*)  
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
lucdespins@paulhastings.com  
nicholasbassett@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured Creditors*

By: /s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC  
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)  
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)  
Juan C. Nieves González, Esq. (USDC - PR 231707)  
Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)  
PO Box 195075  
San Juan, Puerto Rico 00919-5075  
Telephone: (787) 523-3434  
Fax: (787) 523-3433  
jcasillas@cstlawpr.com  
ifernandez@cstlawpr.com  
jnieves@cstlawpr.com  
cernandez@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured Creditors*